**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Robert Wilson, Debtor(s)	Bankruptcy No. 16-14290-sr Chapter 13
Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, as trustee for Normandy Mortgage Loan Trust, Series 2016-1, Movant,	
Robert Wilson, Debtor(s) / Respondent(s),	
and Frederick L. Reigle, Trustee / Respondent.	

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, as trustee for Normandy Mortgage Loan Trust, Series 2016-1, ("Secured Creditor"), by and through its counsel, Matthew C. Waldt, Esquire, as and for its objection to confirmation of Debtor's Chapter 13 Plan, respectfully states as follows:

1. Debtor is Robert Wilson.

2. On June 15, 2016, Debtor filed a petition pursuant to Chapter 13 of Title 11 of the United States Code. Debtor is the owner of the real property commonly known as 8105 Rugby St, Philadelphia, PA 19150 (the "Property").

3. Secured Creditor holds the first mortgage on the Property.

4. Secured Creditor has not yet filed its Proof of Claim but anticipates doing so shortly. As such, Secured Creditor reserves the right to supplement this objection.

5. As will be more fully set forth in the aforementioned Proof of Claim, as of the date of the filing of the instant Chapter 13 petition, total arrears due to Secured Creditor through the Plan are $30,953.19.

6. Debtor's Chapter 13 Plan provides for payment of mortgage arrears to Secured Creditor in the amount of $28,000.00.

7. The Chapter 13 Plan does not provide for Mortgagee to receive distributions with a value equal to the allowed amount of its claim as required by 11 U.S.C. § 1325(a)(5)(B)(ii).

8. The Chapter 13 Plan is not feasible.

9. Secured Creditor objects to the Debtor's Chapter 13 Plan as same does not propose to cure the entire pre-petition delinquency due to Secured Creditor and thus the Plan is not feasible as filed.

WHEREFORE, Secured Creditor respectfully requests that confirmation of Debtor's Chapter 13 Plan be denied unless modified to provide for payment of pre-petition arrears in full, as set forth above, due to Secured Creditor, and for such other just and appropriate relief as the Court may deem proper.

Respectfully submitted,
MILSTEAD & ASSOCIATES, LLC

DATED: August 8, 2016

/s/Matthew C. Waldt

Matthew C. Waldt, Esquire
Attorney ID No. 203308
1 E. Stow Road
Marlton, NJ 08053
(856) 482-1400
Attorneys for Movant

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CERTIFICATION OF SERVICE

Matthew C. Waldt, Esquire counsel for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, as trustee for Normandy Mortgage Loan Trust, Series 2016-1, hereby certifies that a copy of the Objection to Confirmation of Plan was served upon the following persons via electronic transmission or by regular first-class mail, postage pre-paid on August 8, 2016, addressed as follows:

Frederick L. Reigle, Trustee Chapter 13 Trustee 2901 St. Lawrence Avenue P.O. Box 4010 Reading, PA 19606 *via electronic transmission*	Brad J. Sadek, Esquire Sadek and Cooper 1315 Walnut Street Suite 502 Philadelphia, PA 19107 *via electronic transmission*

MILSTEAD & ASSOCIATES, LLC

DATED: August 8, 2016

By: s/Matthew C. Waldt
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1 E. Stow Road
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